

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

FILED

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DAVID CREWS, CLERK
BY *J. Adams* Deputy

UNITED STATES OF AMERICA

v.

CRIMINAL CASE NO. 3:17CR 130

JAVIER VALADEZ, a.k.a. "Primo"	21 U.S.C. § 841(a)
JORGE VALADEZ	21 U.S.C. § 841(b)(1)(C)
QUINLIN LYLES, a.k.a. "Big Boy"	21 U.S.C. § 846
JABARI ALBRITTON	18 U.S.C. § 2
KARWAINE LARK, a.k.a. "Q"	
DERRICK MACK	
JERRY PARKER	

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning at a time unknown to the Grand Jury, but at least from on or about May, 2016 to on or about October, 2017, in the Northern District of Mississippi, and elsewhere, the defendants, JAVIER VALADEZ, a.k.a. "Primo," JORGE VALADEZ, QUINLIN LYLES, a.k.a. "Big Boy," JABARI ALBRITTON, KARWAINE LARK, a.k.a. "Q," DERRICK MACK, and JERRY PARKER, did unlawfully, knowingly and intentionally conspire, combine, confederate and agree with each other and with other persons both known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, to wit: a mixture and substance containing a detectable amount of cocaine and a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 846, 841(a) and 841(b)(1)(C).

COUNT TWO

On or about August 24, 2016, in the Northern District of Mississippi, defendants, JAVIER VALADEZ, a.k.a. "Primo" and JORGE VALADEZ, aided and abetted by each other and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing cocaine hydrochloride, a Schedule II controlled substance as classified by Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

On or about September 16, 2016, in the Northern District of Mississippi, defendants, JAVIER VALADEZ, a.k.a. "Primo" and JORGE VALADEZ, aided and abetted by each other and others known and unknown to the Grand Jury, did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing cocaine hydrochloride, a Schedule II controlled substance as classified by Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

The allegations contained in Count 1 of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

For their engagement in the violations alleged in Count 1 of this Indictment, punishable by imprisonment for more than one year, which count is re-alleged and incorporated as if more fully set forth herein, the defendants, JAVIER VALADEZ, a.k.a. "Primo," JORGE VALADEZ,

QUINLIN LYLES, a.k.a. "Big Boy," JABARI ALBRITTON, KARWAINE LARK, a.k.a. "Q," DERRICK MACK, and JERRY PARKER, shall forfeit to the United States pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(a)(2), all of their interests in property constituting, and derived from, any proceeds the defendants obtained, directly and indirectly, from such violations, and any property used and intended to be used in any manner or part to commit and to facilitate the commission of such violations.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant,

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred, sold to or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or,
- e. Has been commingled with other property which cannot be subdivided without difficulty;

It is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL

/s/signature redacted
FOREPERSON



ACTING UNITED STATES ATTORNEY